

JUL 10 2018

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

David L. Bradley, Clerk of Court

MALIBU MEDIA, LLC
Plaintiff

V.

CHUNG CHEN
Defendant

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§

Civil Action No. 18-cv-00216

DEFENDANT'S ORIGINAL ANSWER

Defendant, Chung Chen, files this original answer to plaintiff's original complaint.

A. ADMISSIONS & DENIALS

1. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 1 of the complaint and on that basis denies those allegations.
2. Defendant denies Paragraph 2.
3. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 3 of the complaint and on that basis denies those allegations.
4. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 4 of the complaint and on that basis denies those allegations.
5. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 5 of the complaint and on that basis denies those allegations.
6. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 6 of the complaint and on that basis denies those allegations.
7. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 7 of the complaint and on that basis denies those allegations.

8. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 8 of the complaint and on that basis denies those allegations.

9. Defendant admits Paragraph 9.

10. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 10 of the complaint and on that basis denies those allegations.

11. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 11 of the complaint and on that basis denies those allegations.

12. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 12 of the complaint and on that basis denies those allegations.

13. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 13 of the complaint and on that basis denies those allegations.

14. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 14 of the complaint and on that basis denies those allegations.

15. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 15 of the complaint and on that basis denies those allegations.

16. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 16 of the complaint and on that basis denies those allegations.

17. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 17 of the complaint and on that basis denies those allegations.

18. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 18 of the complaint and on that basis denies those allegations.

19. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 19 of the complaint and on that basis denies those allegations.

20. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 20 of the complaint and on that basis denies those allegations.

21. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 21 of the complaint and on that basis denies those allegations.

22. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 22 of the complaint and on that basis denies those allegations.

23. Defendant denies Paragraph 23.

24. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 24 of the complaint and on that basis denies those allegations.

25. Defendant denies Paragraph 25.

26. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 26 of the complaint and on that basis denies those allegations.

27. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 27 of the complaint and on that basis denies those allegations.

28. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 28 of the complaint and on that basis denies those allegations.

29. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 29 of the complaint and on that basis denies those allegations.

30. Defendant denies Paragraph 30.

31. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 31 of the complaint and on that basis denies those allegations.

32. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 32 of the complaint and on that basis denies those allegations.

33. Defendant denies Paragraph 33.

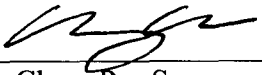
PRAYER

For these reasons, defendant asks the Court to enter judgment that plaintiff take nothing, dismiss plaintiff's suit with prejudice, assess costs against plaintiff, and award defendant all other relief the Court deems appropriate.

Dated: July 10, 2018

RESPECTFULLY SUBMITTED,

By: _____

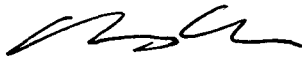

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Houston, Texas 77056
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832-382-0560

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2018, a true and correct copy of the foregoing was filed with the Clerk of the Court in person and sent by U.S. mail and e-mail on the following attorney in charge for plaintiff.

Mr. Paul S. Beik
Beik Law Firm, PLLC
8100 Washington Ave #1000
Houston, TX 77007

By: _____


Chung Chen, Pro Se